

IRELL & MANELLA LLP

A REGISTERED LIMITED LIABILITY LAW PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

840 NEWPORT CENTER DRIVE, SUITE 400
NEWPORT BEACH, CA 92660
TELEPHONE (949) 760-0991
FACSIMILE (949) 760-5200

1800 AVENUE OF THE STARS, SUITE 900
LOS ANGELES, CALIFORNIA 90067

TELEPHONE (310) 277-1010
FACSIMILE (310) 203-7199
WEBSITE: www.irell.com

750 17TH STREET NW, SUITE 850
WASHINGTON, DC 20006
TELEPHONE (202) 777-6500

WRITER'S DIRECT
TELEPHONE (310) 203-7937
FACSIMILE (310) 203-7199
bhattenbach@irell.com

January 19, 2024

MEMO ENDORSED

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Hon. Andrew L. Carter, Jr.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

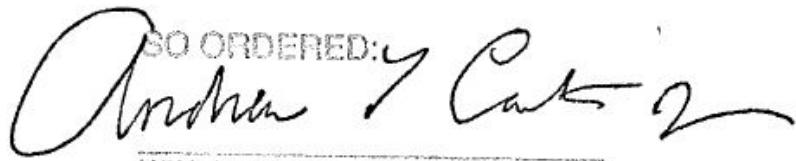
Re: *Adeia Guides Inc. et al. v. Shaw Cablesystems G.P. et al.*
Case No.: 1:23-cv-08796-ALC
Motion for Leave to Redact Portions of Adeia's Response to Shaw's Pre-Motion Letter

Dear Judge Carter:

We represent Plaintiffs Adeia Guides Inc., Adeia Media Solutions Inc., and Adeia Media Holdings LLC (collectively, "Adeia") in the above-referenced action. Pursuant to Your Honor's Individual Practice Rule 6(D), Adeia respectfully requests leave to file Adeia's Response to Shaw's Pre-Motion Conference Letter on its anticipated motion to dismiss ("Response Letter") under seal, and publicly file the Response Letter with proposed redactions, including quotes from, and summaries of, the Interactive Program Guide Patent License Agreement (previously filed under seal at Dkt. 1-1).

Adeia has good and sufficient cause to redact portions of its Response Letter that quote or refer to confidential business information contained in the IPG Agreement, which this Court has previously ordered to be filed under seal. Dkt. 3. Adeia's proposed redactions to the Response Letter are also narrowly tailored to protect truly confidential information in order to protect the public's interest in accessing judicial documents.

Adeia respectfully requests that Your Honor grant leave to file redacted portions of the Response Letter.


SO ORDERED:
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

August 29, 2024
New York, New York

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Respectfully submitted,



IRELL & MANELLA LLP
Benjamin Hattenbach
Email: bhattenbach@irell.com
1800 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

A. Matthew Ashley
Email: mashley@irell.com
Jie Gao
Email: jgao@irell.com
840 Newport Center Drive, Suite 400
Newport Beach, CA 92660
Telephone: (949) 760-0991
Facsimile: (949) 760-5200

SHAPIRO ARATO BACH LLP
Jonathan P. Bach
Email: jbach@shapiroarato.com
Bronwyn C. Roantree
Email: broantree@shapiroarato.com
1140 Avenue of the Americas, 17th FL.
New York, NY 10036
Telephone: (212) 257-4880